

Application No. A. 08-05-_____
Exhibit No: _____
Witness: Hobbs, Richard D.

**TESTIMONY OF RICHARD D. HOBBS
ADDRESSING POLICY ISSUES RELATED TO SOUTHERN CALIFORNIA GAS
COMPANY'S LOW INCOME ENERGY EFFICIENCY AND CALIFORNIA
ALTERNATE RATES FOR ENERGY PROGRAMS FOR PROGRAM YEARS 2009-2011**

Before the Public Utilities Commission
Of the State of California

May 15, 2008

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1 **I. OVERVIEW**

2 The purpose of my testimony is to present policy support for Southern California Gas
3 Company’s (“SoCalGas”) Low Income Assistance Program Applications (“Applications”) for
4 program years (“PY”) 2009–2011. Specifically, I address how SoCalGas’ Low Income Energy
5 Efficiency (“LIEE”) program plans, measures, and budget support the California Public Utility
6 Commission’s (“Commission” or “CPUC”) programmatic LIEE initiative (“programmatic
7 initiative”)¹ to enroll all willing and eligible customers into the program, and the California
8 Energy Efficiency Strategic Plan (“Strategic Plan”) to make energy efficiency an energy
9 resource.² In support of the PY 2009–2011 California Alternate Rates for Energy (“CARE”)
10 request, I offer testimony that demonstrates how SoCalGas’ PY 2009-2011 CARE program plans
11 and budgets support the Commission’s goal to “to reach 100% of the low-income customers who
12 are eligible for and desire to participate in, the CARE program.”³

13 **II. LIEE POLICY FRAMEWORK**

14 In D.07-12-051, the Commission articulated a shift in the focus of large investor-owned
15 utilities’ (“IOUs”)⁴ LIEE programs, stating “the complementary objectives of LIEE programs are
16 to provide an energy resource for California, consistent with our ‘loading order’ that establishes
17 energy efficiency as our first priority, while reducing low-income customers’ bills and improving
18 their quality of life.”⁵ The Commission’s interest in updating LIEE policy objectives and
19 program goals arose in part because of the lessons learned from the state’s energy crisis and the
20 state’s need for adequate and reliable energy resources.⁶ While changing the LIEE program
21 objectives to focus more on energy savings, the Commission underscored its commitment to
22 ensuring that the LIEE programs add to the participant’s quality of life, which implicates equity,
23 energy affordability, bill savings and safety and comfort for those customers who participate in

¹ The programmatic initiative is “to provide all eligible LIEE customers the opportunity to participate in LIEE programs and to offer those who wish to participate all cost-effective energy efficiency measures in their residences by 2020.” D.07-12.051, at p. 25.

² The Strategic Plan was developed by the IOUs in accordance with D. D.07-10-032, and defines innovative new paths to aggressively deliver energy efficiency to the state, and significantly contribute to the state’s goal of having a reasonably priced, stable, reliable and clean portfolio of energy resources.

³ D. 02-07-033, at p. 4.

⁴ IOUs consist of SoCalGas, San Diego Gas & Electric Company (“SDG&E”), Pacific Gas & Electric Company (“PG&E”), and Southern California Edison Company (“SCE”).

⁵ D.07-12-051, at p. 2.

⁶ D.07-12-051, at p. 15.

1 LIEE programs.⁷ In furtherance of its commitment to change the approach of the LIEE programs,
2 the Commission adopted the following policies and program guidelines:

- 3 • LIEE programs should emphasize opportunities to save energy;
- 4 • LIEE programs should be designed to take advantage of all cost-effective energy
5 efficiency opportunities;
- 6 • LIEE programs should include measures that may not be cost effective but that may
7 promote the quality of life of participating customers;
- 8 • LIEE programs should emphasize effective ways to inform customers of the benefits
9 to themselves and their communities of conservation and energy efficiency
10 measures, as well as the way energy efficiency promotes environmental values and
11 reduces greenhouse gases;
- 12 • LIEE programs should be integrated with other energy efficiency programs to allow
13 the utilities and customers to take advantage of the resources and experience of
14 energy efficiency programs, promote economies of scale and scope, and improve
15 program effectiveness; and
- 16 • LIEE programs should take advantage of other resources, such as federally funded
17 programs, local efforts, the work of businesses and publicly-owned utilities.
- 18 • To achieve these objectives, D.07-12-051 directed the IOUs to propose programs and
19 budgets in their PY 2009-2011 applications that will help them move toward the
20 programmatic initiative and the Strategic Plan.

21 SoCalGas' redesigned LIEE program, which reflects the Strategic Plan and supports the
22 programmatic initiative, promotes the program as a reliable energy resource, makes the program
23 available to more customers, offers more cost-efficient program measures, increases leveraging
24 opportunities, and improves the cost-effectiveness of the program.

25 **A. SoCalGas Strategy Concerning LIEE Program Design**

26 SoCalGas supports the Commission's new LIEE policy objectives—to emphasize
27 participating customer benefits and produce energy savings—and has attempted to harmonize
28 these policy objectives into a comprehensive LIEE program that addresses the needs of the LIEE
29 program participants, as well as the needs of the environment and larger community. When
30 developing its LIEE program design, SoCalGas was mindful of the Commission's and parties'

⁷ *Id.* at p. 25.

1 concerns that the interests of low income customers not be compromised in pursuit of the
2 broader energy savings policy objectives.

3 **B. SoCalGas' Proposed LIEE Program Design**

4 For the abovementioned reasons, SoCalGas proposes a LIEE program design that moves
5 away from a "one-size-fits-all" approach to a more comprehensive approach that addresses the
6 unique needs of individual customers and targets the best ways for them to save energy.

7 SoCalGas' proposed LIEE program is comprised of the following six elements: 1) enrollment;
8 2) comprehensive energy audit; 3) customized energy education; 4) installation of measures; 5)
9 inspections; and 6) customer rewards. The following briefly describes the six program elements.

10 1. Enrollment

11 SoCalGas proposes to maintain its current form of streamlined enrollment options, as
12 adopted by the Commission, which include: targeted self certification,⁸ categorical eligibility⁹
13 and eligibility verified through CARE's post enrollment verification process.¹⁰ These options
14 simplify the enrollment process for customers and the outreach specialists who enroll customers.
15 Customers will also continue to be able to enroll by providing proof of income documentation.

16 2. Comprehensive LIEE Energy Audit

17 SoCalGas' proposed program design provides a customized and detailed energy audit,
18 and creates a personalized energy-use profile for each customer. This comprehensive audit will
19 better align the assessment process with the goal of achieving energy savings, reduced
20 greenhouse gases, and lower bills.

21 3. Customized Energy Education

22 SoCalGas is proposing to implement a new and innovative approach to customer energy
23 education. This new educational approach personalizes the needs and characteristics of the
24 customer and is aimed at engaging the customer's participation and commitment to becoming
25 energy smart by using energy wisely. The success of the energy education program will largely
26 depend on customers understanding and appreciating the importance of energy savings,

⁸ See D.06-08-025, which authorized SoCalGas and SoCalGas to the utilize census tract data to identify specific areas of its service territory likely to contain high concentrations of low-income customers, and to permit customers in those areas to enroll in the LIEE program with a simple process to certify income level at p. 3.

⁹ See D.06-12-038, which defines the method under which customers can qualify for CARE or LIEE based on their participation in identified state and federally-funded means tested programs all in an effort to keep qualified customers enrolled in the program at p. 25.

¹⁰ See Assigned Commissioner's Ruling, dated March 29, 2006 in R.04-01-006.

1 developing skilled program personnel to promote and encourage changes in customer behavior,
2 and providing performance feedback to customers.

3 4. Installation of Measures

4 Measures recommended in the audit will be installed by licensed community based
5 organizations (“CBOs”) and contractors participating in the LIEE program. These entities and
6 individuals will be responsible for contacting the customer to schedule installations and complete
7 the services according to program procedures and requirements. SoCalGas contractors will
8 perform a post-installation inspection on a sampling of homes.

9 Some parties erroneously believe that the LIEE programs must offer “all feasible
10 measures” to program participants; however, the provision of “all feasible measures” does not
11 mean that every LIEE participant must receive every measure offered under the program.¹¹

12 Rather, historically “all feasible measures” has been interpreted to mean measures that can be
13 installed in accordance with the Commission-adopted 2006 LIEE Program Statewide Policies
14 and Procedures Manual (“P&P Manual”). As such, and consistent with D.07-12-051, SoCalGas
15 proposes to offer measures that provide and maximize long term, enduring energy savings.

16 5. Inspections

17 Inspections are performed by CBOs and contractors participating in the LIEE program
18 and contractors do not inspect their own installation work. The contractors have a trained staff
19 of experts who provide third-party inspection services to ensure that all LIEE program measures
20 were installed correctly.

21 6. Customer Rewards

22 SoCalGas proposes a new LIEE program element to reinforce energy education, achieve
23 long-term behavioral changes, and create sustained energy savings. This element is designed to
24 reward customers who are able to consistently maintain a reduction in their overall energy
25 consumption. Additionally, it may potentially mitigate the rebound effect, whereby customers
26 use more energy because they have more discretionary dollars, as a result of reduced energy
27 bills.

28 In order to ensure that the Commission’s objectives are to be met and sustainable energy
29 savings are achieved, SoCalGas placed emphasis on those measures that produce real savings
30 and bill reductions. This bill reduction goal is aligned with the resource goal, in that both depend

¹¹ See Public Utilities (“PU”) Code Sections 327, 381.5, and 2790.

1 on energy savings as the primary program achievement. Additionally, SoCalGas' proposal
2 maximizes the use of program funds to reach the greatest number of eligible customers by
3 redirecting program funds that in the past had been used to install measures that produced limited
4 energy savings and/or limited the frequency of the installation of measures. *See* direct testimony
5 of SoCalGas Witness Lucas for more specific details of SoCalGas' LIEE PY 2009–2011
6 program plans, measures, and budgets.

7 **C. Integration and Coordination with other SoCalGas Programs and Between**
8 **SoCalGas and SDG&E**

9 One of the key policy initiatives that SoCalGas is pursuing is the integration of energy
10 efficiency, demand response, and renewable technologies with the LIEE program. SoCalGas
11 believes that an integrated approach is an effective means to pursue long term strategies.
12 SoCalGas' planned integration and coordination efforts help to further this strategy by presenting
13 customers with an array of available programs to respond to their energy needs. By utilizing the
14 synergies between these options, customers will be encouraged to take advantage of all
15 opportunities to reduce their energy consumption.

16 SoCalGas and SDG&E provide natural gas and electric service respectively to customers
17 in Southern Orange County. In this overlapping service territory, SoCalGas and SDG&E will
18 implement a joint enrollment process which will simplify the process and produce cost savings
19 for both customers and the utilities. Similarly, the utilities will work together to develop co-
20 branded direct mailers and other marketing collateral. See the direct testimony of Witness Lucas
21 for further details on SoCalGas' planned integration and coordination between SoCalGas' and
22 SDG&E's programs in their overlapping service territories and with other utility programs for
23 2009–2011.

24 **D. Integration and Coordination with Other Non-Utility Entities**

25 SoCalGas recognizes the value of partnering or collaborating with various entities such
26 as:

- 27 • Cities and local communities;
- 28 • Low Income Home Energy Assistance Program (“LIHEAP”)¹² agencies;
- 29 • Water agencies;
- 30 • CBOs;

¹² LIHEAP is a federally-funded program administered by the California Department of Community Services and Development.

- Schools; and,
- Other entities such as the 211 San Diego, a human service referral program.

For PY 2009–2011, SoCalGas intends to pursue a number of opportunities that are designed to maximize the leveraging potential between the LIEE program and other services that assist low income customers. These leveraging opportunities have the potential to reduce costs, and increase awareness and program participation. For example, SoCalGas has initiated discussions with the California Department of Community Services and Development (“DCSD”) on ways to enhance leveraging between LIEE and LIHEAP’s weatherization program. Also through its energy efficiency local government partnerships (“LGPs”), SoCalGas plans to coordinate with local agencies, city governments, businesses, CBOs and other agencies to increase customer energy efficiency awareness, and to leverage promotion and delivery of the LIEE program. This coordination may also include investigating opportunities that may exist or arise as part of SoCalGas’ other general energy efficiency programs. SoCalGas is also considering other avenues in which to coordinate and leverage program opportunities with entities such as water agencies and schools.

E. Cost Effectiveness

D.07-12-051 instructed that the IOUs’ proposed PY 2009-2011 LIEE program plans take advantage of all cost-effective energy efficiency opportunities. In designing its PY 2009-2011 LIEE program proposal, SoCalGas sought to identify a mix of measures that would best complement the current list of program measures, yield maximum energy savings, help improve the benefit cost ratio, and provide other benefits to customers. Although SoCalGas includes measures, both new and old, that have a benefit cost ratio of less than one, these measures still provide energy savings to the customer. As such, they directly address the Commission’s objectives to provide participant bill savings, improve quality of life and improve the benefit cost ratio. *See* SoCalGas Witness McKinley direct testimony which addresses LIEE program cost-effectiveness and planned measurement and evaluation studies.

F. Strategic Plan

D.07-10-032 directs the IOUs to prepare statewide energy efficiency Strategic Plan for the period PY 2009–2020. The Strategic Plan sets the stage for the next generation of energy efficiency in California. D.07-12-051 directs IOUs to propose program and budgets for 2009–

1 2011 that move toward the programmatic initiative and the Strategic Plan. SoCalGas' LIEE
2 proposal supports the Strategic Plan in the following ways:

- 3 • Strategy 1: Develop customer segmentation to improve program delivery, increasing
4 the opportunities for program participation and energy savings.

5 SoCalGas segmented its customer population based on geographic locations to identify
6 where there are higher concentrations of potentially eligible, non-participating LIEE customers;
7 energy usage; and socioeconomic factors such as age, location, income, etc. Such segmentation
8 and further refinements, will enable SoCalGas to tailor its outreach and marketing efforts toward
9 specific customer segments (such as seniors potentially living on fixed income) to generate a
10 higher response, and ultimately increase program participation.

- 11 • Strategy 2: Pursue collaboration and leveraging of other programs

12 SoCalGas will pursue additional opportunities to collaborate with utilities and local
13 agencies that provide services to low-income customers. All opportunities available to low-
14 income customers will be presented and evaluated at the same time, to determine which
15 programs and services will provide the optimal benefits to the customers. SoCalGas' audit-
16 based, customized approach will ensure each customer receives services that benefit them most.

- 17 • Strategy 3: Integrate LIEE programs with energy efficiency and other demand-side
18 programs.

19 The LIEE program will be integrated with other energy efficiency and low-income
20 programs, offering a comprehensive approach to assist low-income customers. LIEE education
21 will include information on other related programs that provide energy savings opportunities,
22 and energy efficiency program materials will include, where appropriate, information on LIEE
23 services and eligibility requirements. SoCalGas' goal is to ensure that customers are aware of
24 the portfolio of energy savings programs and services that are available to them and the benefits
25 that can be achieved from program participation.

- 26 • Strategy 4: Develop and integrate LIEE workforce training requirements into the
27 Workforce Education & Training ("WE&T") strategy aimed at reaching minority and
28 other disadvantaged communities.

29 LIEE installation training will be directed to a wider network of providers that are more
30 easily accessible to minority, low-income and economically disadvantaged communities.

31 SoCalGas' LIEE proposal will incorporate various providers into the program for the different

1 program elements as needed. For example, SoCalGas will explore the feasibility of coordinating
2 with the local Employment Development Department (“EDD”), which focuses on the needs of
3 low-income and displaced workers in general.

- 4 • Strategy 5: Specify and employ program elements that emphasize long-term and
5 enduring energy savings.

6 SoCalGas’ LIEE proposal focuses on energy efficiency opportunities and savings results
7 for low-income customers by offering and installing those program measures that provide the
8 best energy savings for customers. The program’s education element provides a customized
9 information package for each customer. A new program element will provide rewards to
10 customers who are consistently able to reduce overall consumption. This new approach will
11 reinforce energy education and encourage enduring energy savings.

- 12 • Strategy 6: Specify and deploy Marketing Education & Outreach for LIEE program
13 consistent with energy efficiency strategies.

14 Targeted outreach and marketing strategies will be implemented to increase awareness
15 and participation in energy efficiency programs available to low income customers. Using the
16 results of the customer segmentation will allow SoCalGas to design and deploy outreach and
17 marketing strategies to effectively reach potential LIEE customers. SoCalGas will be actively
18 involved in statewide marketing, education, and outreach task force(s) and other similar activities
19 to ensure that the specific communication needs of its low-income customers are addressed
20 through statewide efforts.

21 **G. Innovative Pilot Programs for PY 2009–2011**

22 SoCalGas is committed to providing assistance to low income customers and identifying
23 new and innovative ways to help them understand how their behavior can impact their energy
24 usage and utility bill. SoCalGas’ objective is to provide measures that will be easy for low
25 income customers to understand and execute, as well as provide measures that will result in
26 energy savings. SoCalGas proposes to offer a natural gas high-efficiency forced air unit
27 (“FAU”) furnace pilot to customers with high space heating needs during the winter season. The
28 pilot will replace existing, inefficient operational natural gas FAU furnaces with high-efficiency
29 units that have an efficiency rating of at least 92%.

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1 **III. PY 2009-2011 CARE PROGRAM PROPOSALS**

2 **A. SoCalGas Approach to CARE Program Design**

3 As of March 2008, 1,348,714 million customers were enrolled in SoCalGas' CARE
4 program. SoCalGas projects that participation will continue to increase to 1,364,235 million
5 customers by year-end 2008, which will bring its CARE penetration rate to 79.5% by year-end
6 2008. Consistent with the Commission's goal to enroll all eligible and willing customers into the
7 CARE program, SoCalGas proposes several initiatives in PY 2009-2011 to not only encourage
8 CARE enrollment, but also retain eligible customers in the program. SoCalGas proposes a
9 number of innovative outreach, marketing, and enrollment approaches designed to further
10 simplify the CARE enrollment process and increase the number of customers participating in the
11 program. Several of SoCalGas' proposals for PY 2009-2011 are designed to mitigate the
12 number of eligible customers who are dropped from CARE because they do not respond to
13 mailed requests for recertification or post enrollment verification.

14 **B. Program Modifications to Increase Program Participation**

15 In order to further the Commission's goal to enroll all willing and eligible CARE
16 customers, SoCalGas is proposing modifications to its Processing/Certification/Verification
17 procedures to further encourage customer enrollment and retention. Specifically, SoCalGas plans
18 to reduce the recertification period for sub metered customers and customers living in non-profit
19 group living facilities, agricultural housing, and non-profit migrant farm worker housing.
20 SoCalGas also plans to allow customers to complete incomplete applications over the telephone.
21 In addition, SoCalGas proposes to automatically qualify all Section 8 and Public housing
22 participants for participation in the CARE program, and allow them to categorically enroll.

23 SoCalGas' outreach plan for PY 2009-2011 builds on the success of current effective
24 approaches in order to increase program participation in areas of low penetration, and to enhance
25 strategies to reach the hard-to-reach, special needs, CARE-eligible customers. SoCalGas will
26 also investigate more convenient methods to help these customers apply for the CARE program.
27 SoCalGas' proposed outreach plan is based on the cost effective use of multiple communication
28 media, designed to effectively segment SoCalGas' low-income customers and communicate the
29 program to those identified as most likely to be eligible.

30 Based on SoCalGas' experience in administering the CARE program, the enrollment of
31 CARE customers alone will not be sufficient to reach enrollment goals, and retaining current

1 customers in the program will continue to be challenging. During PY 2009-2011, SoCalGas will
2 continue to employ existing enrollment strategies (e.g., use of H&R Block, internet, and new
3 capitation contractors), explore the reasons for attrition, and devise new approaches for enrolling
4 and retaining eligible customers. SoCalGas also proposes to work with the Energy Division, the
5 Telecommunications Division, telephone carriers, and interested parties to evaluate the potential
6 of establishing either a data sharing process or to categorically enroll participants in the
7 California Lifeline program into the CARE program.¹³

8 SoCalGas' proposed modifications to the CARE program are designed to: 1) offer
9 customers a simple and convenient enrollment process, in order to promote increased program
10 enrollment; 2) facilitate a smooth and seamless recertification process, in order to encourage
11 program retention 3) improve outreach activities, in order to communicate the benefits of the
12 CARE program to a broader array of potential CARE customers; 4) continue and expand
13 coordination efforts with CBOs, local governments, school districts, and other organizations, in
14 order to reach the hardest-to-reach customers and further build community awareness about the
15 CARE program. The direct testimony of Witness Rudshagen discusses the specific details of
16 SoCalGas' PY 2009–2011 CARE program plans and budgets.

17 **IV. RATE AND BILL IMPACTS RESULTING FROM THE INCREASED 2009-2011**
18 **LIEE AND CARE PROGRAM BUDGETS**

19 In order to achieve the Commission's aggressive LIEE Programmatic Initiative and
20 CARE penetration goals, SoCalGas requests approval of increased budgets beyond the current
21 PY 2007-2008 program funding levels. The request for approval of the increased budgets will
22 result in rate and bill impacts for SoCalGas' customers. SoCalGas has attempted to design the
23 PY 2009-2011 LIEE and CARE programs to meet Commission goals, while balancing the
24 impacts on ratepayers. SoCalGas' proposed PY 2009–2011 LIEE budget is \$174 million.
25 SoCalGas' proposed CARE administrative budget for PY 2009–2011 is \$19 million.

26 Witness Lucas' direct testimony discusses the LIEE program budget details, and Witness
27 Rudshagen's direct testimony discusses CARE program budget details. The details of the rate
28 and bill impacts are described in the Application.

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¹³ Currently eligibility requirements for CARE and the California Lifeline program differ in terms of income guidelines, the definition of a residence, and the list of programs by which customers can categorically enroll in the programs. These issues will need to be resolved before an automatic enrollment or categorical enrollment process would be possible.

1 **V. OUTSTANDING LIEE AND CARE ISSUES**

2 There are a number of outstanding issues that parties have brought before the
3 Commission, relating to the cost effectiveness of the LIEE program and the use of the September
4 7, 2007 Phase II Needs Assessment Report (“Report”) prepared for the Commission by KEMA,
5 Inc. Because these issues could potentially impact SoCalGas’ proposed low income assistance
6 program designs for PY 2009–2011, these issues require Commission attention and resolution:

7 Cost-effectiveness Issues for LIEE Program

- 8 • On February 22, 2008, SoCalGas and SoCalGas, along with the other large IOUs
9 submitted joint pre-workshop comments recommending that 1) the cost-effectiveness
10 model be updated to use the current avoided costs and environmental adders approved
11 in D. 05-04-024 and D. 06-06-063, 2) the calculation of non-energy benefits
12 (“NEBs”) used in the LIEE cost effectiveness model should be based on values that
13 are updated; and, 3) additional research be conducted to determine the
14 appropriateness and scale of the NEBs.
- 15 • Currently, in the Energy Efficiency programs, an overall program portfolio must meet
16 a Total Resource Cost (“TRC”) threshold of 1.0. SoCalGas recommends that the
17 Commission make a determination as to the appropriate cost-effectiveness threshold
18 to use in evaluating the LIEE programs or whether or not the thresholds adopted in D.
19 02-08-034 should continue. Historically, the LIEE programs have not been required
20 to meet the minimum threshold of 1.0 due to the Commission’s equity objectives for
21 the LIEE program.¹⁴

22 KEMA Needs Assessment for LIEE and CARE

- 23 • On September 27, 2007, Administrative Law Judge Kim Malcolm issued a Ruling
24 seeking comments on the Report prepared for the Commission by KEMA, Inc.
25 SoCalGas and SoCalGas jointly filed comments which discussed concerns regarding
26 the Sampling and Survey Implementation, Analysis and Ultimate Use of Survey Data,
27 and a Determination of a Target for enrollment in the CARE program or participation
28 in LIEE. Several other parties commented on the Report data and pointed out
29 discrepancies in the Report regarding 1) inaccurate tables and factual errors; 2) lack
30 of analysis and analysis data in the Report; 3) unsubstantiated conclusions; 4) unclear

¹⁴ See D. 94-10-059, at p. 119.

1 recommendations on the CARE population targets; 5) insufficient sampling data for
2 the small and multi-jurisdictional utilities; conflicting recommendations; and, 6)
3 departure from the principal objectives of the Report.

- 4 • To date, the Commission has not addressed parties' concerns with the Report, nor has
5 the Commission indicated how the Report is to be used. As such, SoCalGas only
6 used limited data from the Report in developing its program plans and budgets for PY
7 2009–2011. Rather, SoCalGas utilized independent analysis which utilized
8 demographic and census data to establish its goals and program plans.
- 9 • Accordingly, SoCalGas recommends that the Commission seriously consider parties'
10 concerns. These concerns should be addressed before directing changes in the
11 proposed LIEE and CARE program design for PY 2009–2011, if the changes are to
12 be based on the Report's recommendations.

13 **VI. CONCLUSION**

14 Accordingly, this testimony recommends that the Commission: 1) approve SoCalGas'
15 proposed PY 2009-2011 LIEE and CARE plans and budgets, 2) find that the programs comply
16 with the Commission's stated objectives for the LIEE and CARE programs, and 3) address the
17 LIEE and CARE program policy issues discussed herein.

18 This concludes my prepared written testimony
19

